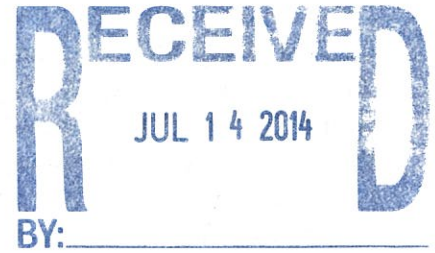




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**RE: Comments on Notice of Preparation for the Los Angeles County Antelope Valley
Areawide General Plan Update – June 12, 2014**

Mr. Carl Nadela,

These comments are submitted on behalf of the Center for Biological Diversity (Center) regarding the Notice of Preparation for the Los Angeles County Antelope Valley Areawide General Plan Update dated June 12, 2014. At the Center for Biological Diversity, we believe that welfare of human beings is deeply linked to nature – to the existence in our world of vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, we work to secure a future for all species, great and small, hovering on the brink of extinction. We do so through science, law and creative media, with a focus on protecting lands, waters and climate that species need to survive. We want those that come after us to inherit a world where the wild is still alive. Many of our 775,000 staff, members and on-line activists in California and throughout the United States, live in, know and enjoy the biological diversity and world class landscape of northern Los Angeles County, including the Antelope Valley area.

Los Angeles County is a globally unique county which spans incredible topographic diversity – from the Pacific Ocean to Mount San Antonio (Mt. Baldy) at 10,068 feet and back down to the Mojave Desert. Because of the topographic diversity often coupled with significant development, many rare, threatened and endangered species occur within the County. While much of the coastal basin has been developed, the mountainous areas and desert areas remain ecologically intact and home to numerous rare species. The proposed Antelope Valley Areawide General Plan Update (AVAP) is a key document where the County has an opportunity to craft a plan that will indeed protect and sustain our world class natural heritage.

I. Inappropriate and Conflicting Land Use/Zoning Proposals

It appears that the AVAP includes the yet-to-be proposed Centennial project located in the western part of the Antelope Valley. The proposed land use designations of H5 – high density residential 5 (0-5 du / net ac), RL1 - Rural Land 1 (1 du/ gross ac) and IL – Light

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Industrial is in complete conflict with the surrounding land use designations of OS-C – Open Space Conservation, and RL 20, 10 and 2 – Rural Land 20 (1 du/20 gross ac), Rural Land 10 (1 du/10 gross ac) and Rural Land 2 (1 du/2 gross ac) respectively. In addition, the RL1 and IL and most all of the H5 are located in a Significant Ecological Area (SEA). While we recognize that some development of private lands are allowed in SEAs, certainly high density and industrial land use designations are inappropriate in SEAs. Interestingly and appropriately, **none** of the other SEA areas in the AVAP proposal have the extensive high development land use proposed within the boundary of the SEA. West of this area the document proposes CR – Commercial Rural designations in areas again that are proposed SEAs and surrounded by OS-C – Open Space Conservation, RL 20 - Rural Land 20 (1 du/20 gross ac) and OS-PR – Open Space Parks and Recreation. We urge the County to remove the H5, RL1, CR and IL designations and conform them to land use designations that are compatible with the SEA designation. The County need not create land use conflicts by layering incompatible land use designations in the same area.

To confuse matters further, the zoning maps show the yet-to-be-proposed Centennial project area as A-2-10, which is not clearly defined in the legend other than A-2 is heavy agriculture. At the current time, the land use appears to be primarily grazing, not crops. The zoning map also proposes MPD-PD - Manufacturing Industrial Planned Development (legend does not indicate what the –PD stands for), CR-U – Commercial Rural and CPD-DP - Commercial Planned Development (legend does not indicate what the –PD stands for here either) and is surrounded by O-S – Open Space and A-2 – Heavy agriculture. Again, the majority of the area is also within the boundaries of the SEA. To date, there have not been public proposals for commercial or industrial developments in this area that is highly significant for biological resources which need to be maintained as part of Los Angeles County’s natural heritage. We urge the County to remove the MPD, CR-U and CPD designations and conform them to land use designations that are compatible with the SEA designation. The County need not create land use conflicts by layering incompatible land use designations in the same area.

Regarding the Rural Preservation Strategy map, the Rural Preserve Areas are defined as “largely undeveloped and generally not served by existing infrastructure and public facilities. Many of these areas contain environmental resources, such as Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas” (Land Use Element at pg. 5). Virtually the whole of the yet-to-be-proposed Centennial project area and Gorman area are identified as Rural Preserve Areas. Proposing land use categories of HR5, RL1, CR and IL in these areas clearly undermines preserving rural areas and, as mentioned above, sets up conflicting designations. We urge the County to maintain the Rural Preserve Area designation and place more appropriate zoning and land use designations on these areas.

Additionally the Rural Preservation Strategy Map legend does not include all designations on the map. For example, cross hatching occurs in different areas of the map. If the cross-hatching represents Economic Opportunity Areas, this is clearly misplaced because a significant portion of the lands in the cross-hatched areas are identified as Rural Preserve Areas, which seems to conflict with Economic Opportunity Areas (EOAs). The NOP describes the EOAs as “areas where plans for major infrastructure projects are underway that would create conditions for development vastly different than currently existing on the ground.” (NOP at pg

4). While we are aware of the highway projects, the County should not be encouraging sprawl development in remote areas of the County by altering land use and zoning in the AVAP (which basically covers all of the north Los Angeles County).

II. "Smart" Development

While the Center's focus is protecting rare and common species and their habitats, one key aspect to achieve habitat protection and ensure ecological sustainability is to avoid sprawl development. The County needs to concentrate growth in compact walkable urban centers and avoid sprawl. It also needs to plan compact, transit-oriented, walkable, bicycle-friendly land use, near existing development. Planning Economic Opportunity Areas and Rural Town Areas in far-flung regions of the County where little County infrastructure including emergency services is in place, and will be expensive to maintain is an anathema to smart planning.

III. Public Outreach

While the Introduction touts "highly inclusive and extensive community participation program", the Center did not become aware of this effort until mid-June of 2014, and only then through local contacts. We have worked with County planning staff on different projects in the past and specific to this project put in email and phone messages to the County Planning which remain unanswered. We have great interest in the County's planning and development activities and ask again to be put on the interested public list for projects. We also specifically ask to be put on the interested parties' list for the AVAP as it moves forward through the CEQA process.

IV. Conclusion

We urge the County to adopt land use, zoning and planning that encourages sustainable development while protecting our incredible diversity and natural heritage in Los Angeles County for future generations.

Respectfully submitted,



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